

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Christine Bennett

) Chapter 13

) Bankruptcy No. 19-11414

Debtor(s))

MOTION TO REINSTATE AUTOMATIC STAY

Debtor Christine Bennett, by her counsel Sharon S. Masters, Esquire, request(s) an order reinstating the automatic stay with respect to U.S. Bank National Association, and in support thereof avers as follows:

1. The debtor(s) filed this Chapter 13 bankruptcy petition on March 7, 2019.
2. The Chapter 13 Plan was confirmed on October 16, 2019.
3. On May 25, 2022, relief from stay was granted to U.S. Bankf.
4. Debtor filed a Motion to Vacate Relief Order, which was resolved by Stipulation, approved by the Court on November 22, 2022. The amount of arrears as of the date of the Stipulation was \$112.10.
5. A Certificate of Default of the Stipulation was filed by U.S. Bank on May 30, 2023, and Relief was again granted on June 20, 2023.
6. Debtor has requested a payment history from U.S. Bank and is waiting to receive and review it. Debtor believes and therefore avers that she has tendered all post-petition mortgage payments to U.S. Bank to date.

WHEREFORE, the Debtor prays that this Court grant the Motion to Reinstate Automatic Stay as to mortgage creditor U.S. Bank.

/s/ Sharon S. Masters, Esq.
Sharon S. Masters, Esq.
Counsel for Debtor(s)

Dated: 10/12/2023